

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11 (Subchapter V)
FREE SPEECH SYSTEMS LLC,	)	
	)	Case No. 22-60043 (CML)
Debtor.	)	
	)	

**CONNECTICUT PLAINTIFFS'  
WITNESS AND EXHIBIT LIST**

Judge	Hon. Christopher M. Lopez
Hearing Date	Monday, March 11, 2024
Hearing Time	3:00 p.m. (CT)
Party's Name	Connecticut Plaintiffs
Attorney Names	Ryan E. Chapple Kyle J. Kimpler
Attorney Phones	512-477-5000 (Ryan Chapple) 212-373-3253 (Kyle Kimpler)
Nature of Proceeding	<p>Debtor's Emergency Motion of the Law Offices of Ray Battaglia, PLLC, to Withdraw as Counsel for Free Speech Systems, LLC [22-60043 Dkt. 830]</p> <p>Debtor's Emergency Application for Entry of an Order (I) Authorizing the Debtors to Retain and Employ O'ConnorWechsler, PLLC as Bankruptcy Counsel and (II) Granting Related Relief [22-60043 Dkt. 835]</p> <p>Debtor's Emergency Motion to File Under Seal an Unredacted Version of the Redacted Filing at ECF #836, Debtor's Response to the Motion to Withdraw of Counsel Assigned ECF #830, Unopposed by Movant [22-60043 Dkt. 841]</p> <p>Subchapter V Trustee's Initial Findings of Free Speech Systems, LLC Investigation [22-60043 Dkt. No. 549]</p>

David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole  
Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M.

Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, and Robert Parker (collectively, the “Connecticut Plaintiffs”) hereby submit this Witness and Exhibit List (“Witness and Exhibit List”) in connection with the hearing on (a) *Motion of the Law Offices of Ray Battaglia, PLLC, to Withdraw as Counsel for Free Speech Systems, LLC* [22-60043 Dkt. 830]; (b) *Debtor’s Emergency Application for Entry of an Order (I) Authorizing the Debtors to Retain and Employ O’ConnorWechsler, PLLC as Bankruptcy Counsel and (II) Granting Related Relief* [22-60043 Dkt. 835]; (c) *Debtor’s Emergency Motion to File Under Seal an Unredacted Version of the Redacted Filing at ECF #836, Debtor’s Response to the Motion to Withdraw of Counsel Assigned ECF #830, Unopposed by Movant* [22-60043 Dkt. 841]; and (d) *Subchapter V Trustee’s Initial Findings of Free Speech Systems, LLC Investigation* [22-60043 Dkt. 549], to be held on Monday, March 11, 2024, at 3:00 p.m. (Central Time).

The Connecticut Plaintiffs reserve the right to supplement, amend, or revise this Witness and Exhibit List at any time prior to the hearing, including with new witnesses and additional exhibits. Further, the Connecticut Plaintiffs reserve the right to use any exhibits or question any witness presented by any other party, to ask the Court to take judicial notice of any document, and to introduce exhibits previously admitted.

#### **WITNESS LIST**

The Connecticut Plaintiffs may call the following witnesses at the hearing:

1. Patrick Magill;
2. Ray Battaglia;
3. Harold “Hap” May;

4. Annie Catmull;
5. Any witness necessary to rebut the testimony of any witness called or designated by any other parties;
6. Any witness listed or called by any other party.

### EXHIBIT LIST

The Connecticut Plaintiffs may offer for admission into evidence any of the following exhibits at the hearing:

No.	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1.	Debtors' Amended Emergency Application for Entry of an Order Authorizing the Debtor to Retain and Employ Harold "Hap" May, PC as Co-Counsel [Dkt. 809]				
2.	PQPR Holdings Limited, LLC's Objection to Debtor's Amended Emergency Application for Entry of an Order Authorizing the Debtor to Retain and Employ Harold "Hap" May, PC as Co-Counsel [Dkt. 811]				
3.	Subchapter V Trustee's Statement in Support of the Debtor's Amended Emergency Application to Employ Harold "Hap" May, PC [Dkt. 813]				
4.	PQPR Holdings Limited, LLC's Request for Status Conference [Dkt. 828]				

5.	Emergency Motion of the Law Offices of Ray Battaglia, PLLC, to Withdraw as Counsel for Free Speech Systems, LLC [Dkt. 830]				
6.	Debtor's Emergency Application for Entry of an Order (I) Authorizing the Debtors to Retain and Employ O'ConnorWechsler, PLLC as Bankruptcy Counsel and (II) Granting Related Relief [Dkt. 835]				
7.	O'ConnorWechsler Letter [Dkt. 835-2]				
8.	Debtor's Response to the "Emergency Motion of the Law Offices of Ray Battaglia, PLLC, to Withdraw as Counsel for Free Speech Systems, LLC [Dkt. 836]				
9.	Debtor's Response to the "Emergency Motion of the Law Offices of Ray Battaglia, PLLC, to Withdraw as Counsel for Free Speech Systems, LLC [Unredacted]				

10.	Subchapter V Trustee's Emergency Motion to Supplement the Order (A) Authorizing Employment of Patrick Magill as Chief Restructuring Officer, (B) Authorizing Employment of Staff of Magill PC in Discharge of Duties as Chief Restructuring Officer, and (C) Granting Related Relief [Dkt. 838]				
11.	Debtor's Emergency Motion to File Under Seal an Unredacted Version of the Redacted Filing at ECF # 836, Debtor's Response to the Motion to Withdraw of Counsel Assigned ECF #30, Unopposed by Movant [Dkt. 841]				
12.	Declaration of Annie Catmull Proposed Bankruptcy Counsel and Disclosure of Compensation [Dkt. 842]				
13.	PQPR Holdings Limited, LLC's Motion for Entry of an Order Directing the Appointment of an Examiner, or, in the Alternative, to Convert Case to Chapter 7 [Dkt. 847]				

14.	Debtor's Emergency Application for Entry of an Order Authorizing the Debtor to Retain and Employ Harold "Hap" May, PC as Co-Counsel [Dkt. 806]				
15.	PQPR Holdings Limited, LLC's Response and Objection Emergency Motion of the Law Office of Ray Battaglia, PLLC, to Withdraw as Counsel for Free Speech Systems, LCC [Dkt. 846]				
16.	Subchapter V Trustee's Initial Findings of Free Speech Systems, LLC Investigation [22-60043 Dkt. 549]				
	Any other document or pleading filed in the above-captioned case				
	Any exhibits identified or offered by any other party				
	Any exhibits necessary for impeachment and/or rebuttal purposes				

*[Remainder of page intentionally left blank]*

Respectfully submitted this 8th day of March 2024.

**CAIN & SKARNULIS PLLC**

By: /s/ Ryan E. Chapple

Ryan E. Chapple

State Bar No. 24036354

303 Colorado Street, Suite 2850

Austin, TX 78701

Telephone: (512) 477-5000

Fax: (512) 477-5011

Email: rchapple@cstrial.com

**KOSKOFF KOSKOFF & BIEDER, PC**

Alinor C. Sterling (admitted *pro hac vice*)

350 Fairfield Avenue

Bridgeport, CT 06604

Telephone: (203) 336-4421

Email: asterling@koskoff.com

**PAUL, WEISS, RIFKIND,**

**WHARTON & GARRISON LLP**

Kyle J. Kimpler (admitted *pro hac vice*)

Paul Paterson (admitted *pro hac vice*)

Stephanie P. Lascano (admitted *pro hac vice*)

Vida Robinson (admitted *pro hac vice*)

1285 Avenue of the Americas

New York, NY 10019-6064

Telephone: (212) 373-3000

Fax: (212) 757-3990

Email: kkimpler@paulweiss.com

Email: ppaterson@paulweiss.com

Email: slascano@paulweiss.com

Email: vrobinson@paulweiss.com

***Co-Counsel to the Connecticut  
Plaintiffs***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Witness and Exhibit List has been served on counsel for Debtors, Debtors, and all parties receiving or entitled to notice through CM/ECF on this 8th day of March 2024.

/s/ Ryan E. Chapple

Ryan E. Chapple